

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
V.)	CRIMINAL NO. SA-22-CR-00570-OLG
)	
CHANDLER BRITAIN BRADFORD (1))	
RICARDO RODRIGUEZ-SOTELO (3),)	
)	
Defendants.)	

**UNITED STATES OF AMERICA'S
BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Property.

On December 07, 2022, a Superseding Indictment (Doc. 77) was returned against the Defendants for violations of Title 18 U.S.C. §§ 371, 554(a), 922(a)(1)(A), 1956(h), and 1956(a)(2)(A). The Indictment included a Notice of United States of America's Demand for Forfeiture which gave notice that the United States seeks the criminal forfeiture of property pursuant to Title 18 U.S.C. §§ 982(a)(1), 981(a)(1)(C), and 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461. Specifically, this Bill of Particulars seeks the criminal forfeiture of the property listed herein.

The United States hereby gives notice that it seeks the criminal forfeiture of certain properties from the Defendants as follows:

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Conspiracy to Smuggle Goods from the United States Violations and Forfeiture Statutes
[Title 18 U.S.C. §§ 371 and 554, subject to forfeiture pursuant to Title 18 U.S.C. §

981(a)(1)(C), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the criminal violations set forth in Counts One through Three of the Superseding Indictment, the United States of America gives notice to the Defendants of its intent to seek the forfeiture of the property listed below upon conviction pursuant to Title 18 U.S.C. § 981(a)(1)(C) as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 981. Civil forfeiture

(a) (1) The following property is subject to forfeiture to the United States:

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

The offense of Smuggling Goods from the United States is an offense constituting “specified unlawful activity” as defined in Title 18 U.S.C. § 1956(c)(7).

II.

Firearms Violations and Forfeiture Statutes

[Title 18 U.S.C. § 922(a)(1)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461]

As a result of the criminal violation set forth in Count Four of the Superseding Indictment, the United States of America gives notice to Defendants of its intent to seek the forfeiture of the property listed below upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461, which states:

Title 18 U.S.C. § 924. Penalties

(d)(I) Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (a) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . .

III.

Money Laundering Violations and Forfeiture Statutes

[Title 18 U.S.C. §§ 1956(h) and 1956(a)(2)(A), subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1)]

As a result of the criminal violations set forth in Count Five of the Superseding Indictment, the United States of America gives notice to Defendants of its intent to seek the forfeiture of the property listed below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 982(a)(1), which states:

Title 18 U.S.C. § 982.

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956, 1957, ... of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Bill of Particulars includes but is not limited to the following properties:

IV.
PERSONAL PROPERTIES

CHANDLER BRITAIN BRADFORD (1):

1. Box 1 Containing 25 AR-15 Upper Receivers W/ BCG And Charging Handle, Quad Rail, Black 7.5" Barrels;
2. Box 2 Containing 15 AR-15 Upper Receivers W/ BCG And Charging Handle, Quad Rail, Black 7.5" Barrels;
3. Box 3 Containing 10 AR-15 Upper Receivers W/ BCG And Charging Handle, Quad Rail, Stainless Steel 7.5" Barrels;
4. Box 4 Containing 20 AR-15 Upper Receivers W/ BCG And Charging Handle, Quad Rail, Stainless Steel 7.5" Barrels;
5. Box 5 Containing 10 AR-15 Upper Receivers W/ BCG And Charging Handle, Quad Rail, Black 7.5" Barrels, 20 AR-15 Upper Receivers W/ BCG/Ch, Quad Rail, Stainless Steel 7.5" Barrels;
6. One Box Of 3 80% Receivers, Easy Jig And Jig Router;
7. 160 Rounds Assorted Manufacturer Ammunition CAL: Assorted;
8. \$2,668.00 U.S. Currency;
9. Assorted Firearm Parts (Polymer80, Palmetto State Armory & Bear Creek Arsenal Parts);
10. Assorted Firearm Parts (Rubber Bin Containing Various Parts);
11. Firearm Parts, AR Rails, 8 Boxes X 25 Each, 200 Total;
12. Assorted Firearm Parts;
13. Assorted Firearm Parts;
14. 140 Buffer Tubes And Springs, Firearm Parts;
15. 134 PMAG 30 Round M4/AR;
16. 106 Stocks For AR;
17. 124 Firearm Parts, AR Rails;

18. 81 Firearm Parts Charging Handles;
19. 155 Firearm Parts, Stock Pads;
20. 43 Firearm Parts, Handgrips & Trigger Assembly;
21. 99 AR Upper Receiver, Firearm Parts;
22. Assorted Firearm Parts, 10 80% Lowers, 11 Receivers, AR Upper Receiver, 10 5.56 Full Auto, Bolt Carrier Group, 4 Pistol Brace Kits, Lower Parts Kit;
23. 100, 7.5 Inch 223 Barrels;
24. Storage Bin With Multiple Drawers Containing Lower Parts For AR-15;
25. Firearm Parts, AR Rails And Scopes;
26. Assorted Firearm Parts, Muzzle Breaks And Misc Parts;
27. AIC - Builder Parts, Router 8 Drilling Blanks, Drill Bits, Manufacturing Tools;
28. 5 AR Kits W/ 80% Lower;
29. 2860 Rounds Assorted Manufacturer Ammunition CAL:Assorted;
30. Central Machinery 12 Speed Bench Drill Press;
31. AR Handgrips, Muzzle Breaks, Charging Handles, Misc Parts;
32. Charging Handles, AR Grips, Muzzle Breaks And Misc Parts;
33. High Capacity Mags For AR & Shotgun, Shotgun Stocks, 2 Barrels;
34. Firearm Parts, Misc Barrels, AR Barrels, Glock Barrels;
35. Firearm Parts, Misc Manufacturing Tools, Jigs, AR Armorer Mount, Scale;
36. One Box Containing Misc Firearm Parts, Armorer Mat, Glock Parts, Foregrips;
37. Seven AR-15 Completed Upper Receivers, Two Have Barrels Less Than 16";
38. 5 Magazines And Other Firearm Accessories;
39. 3 Glock Style Slides With Barrels;
40. 2723 Rounds Assorted Manufacturer Ammunition CAL:Assorted;
41. Five High Capacity Magazines, Other Misc Firearm Parts And 2 Magazines;
42. 36 Gun Rhino Safe, Model: CD6030X, Blue;
43. 50 Bolt Carrier Groups In Box From R&J Legacy Inc, Box 1 Of 2;
44. 50 Bolt Carrier Groups In Box From R&J Legacy Inc, Box 2 Of 2;
45. Approx. 203 AR-15 Barrel Nuts In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
46. 40 AR-15 Quad Hand Rails In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
47. 40 AR-15 Quad Hand Rails In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
48. 40 AR-15 Quad Hand Rails In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
49. 40 AR-15 Quad Hand Rails In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
50. 40 AR-15 Quad Hand Rails In A Box From Jack At CSS Technology Solution Co LTD In Hong Kong, China; Shipped September 28, 2022;
51. 418 One Ounce Coins (Silver);
52. 12 Two Ounce Coins (Silver);
53. 1 Five Ounce Coins (Silver);
54. 81 Assorted Coin Collection (62 Silver, 19 Gold);
55. 3 One Ounce Coins (Silver);

56. 2023 Chevrolet Corvette Coupe 1G1YA2D40P5113302;
57. 2022 Ford Bronco Utility 1FMDE5BH8NLA91636;
58. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses; and
59. Any property constituting or derived from, any proceeds the person(s) obtained directly or indirectly, as a result of the commission of the criminal offenses.

RICARDO RODRIGUEZ-SOTELO (3):

1. 80 Completed AR-15 Upper Receiver With BCG, CH, 7.5" Barrels
2. 1 Box Containing 50 Lower Parts Kit And 50 Firearm Butt Pads
3. 1 Box Containing 144 Firearm Butt Pads
4. 1 Box Containing 100 Stocks
5. 1 Box Containing 50 Firearm Buffer Kits
6. 1 Box Containing 100 Magazines, High Capacity
7. 1 Box Containing 50 AR-15 Lower Parts Kits And 6 Butt Pads
8. 1 Box Containing 50 Firearm Buffer Kits;
9. Any and all firearms, ammunition, and/or accessories involved in or used in the commission of the criminal offenses; and
10. Any property constituting or derived from, any proceeds the person(s) obtained directly or indirectly, as a result of the commission of the criminal offenses.

IV.

Money Judgment

Money Judgment: A sum of money that represents the amount of proceeds obtained, directly or indirectly, property involved in such offenses, or traceable to such property as a result of the violations set forth in the Counts above, for which Defendants are individually liable.

V.

Substitute Assets

If any of the property described above as being subject to forfeiture for the violations set forth above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America to seek forfeiture of any other property, up to the value of said money judgment, as substitute assets, pursuant to Title 21 U.S.C. 853(p) and Fed. R.

Crim. P. 32.2(e)(1).

Respectfully submitted,

JAIME ESPARZA
United States Attorney

By: /s/
MARY NELDA G. VALADEZ
Assistant United States Attorney
Chief, Asset Forfeiture Section
601 N.W. Loop 410, Suite 600
San Antonio, Texas 78216
Tel: (210) 384-7040
Fax: (210) 384-7045
Texas Bar No. 20421844
Email: Mary.Nelda.Valadez@usdoj.gov

Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2023, the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System which will transmit notification of such filing to the following CM/ECF participants:

David M. Shearer
LaHood Norton Law Group (Of Counsel)
40 Ne Loop 410, Suite 525
San Antonio, TX 78216
Email: david@lahoodnorton.com
Attorneys for Defendant Chandler Britain Bradford (1)

Jay S. Norton
Lahood Norton Law Group PLLC
40 NE Loop 410, Suite 525
San Antonio, TX 78216
Email: jay@lahoodnorton.com

Joseph Ronald Barroso
Attorney at Law
5350 South Staples, Suite 401
Corpus Christi, TX 78411
Email: rbarrosolaw@interconnect.net
Attorney for Defendant Ricardo Rodriguez-Sotelo (3)

/s/
MARY NELDA G. VALADEZ
Assistant United States Attorney